



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

October 26, 2006

REPLY TO THE ATTENTION OF:
DE-9J

Mr. Kevin Boland
CSX Real Property, Inc.
301 West Bay St
Suite 800
Jacksonville, FL 32202

RE: U.S. EPA Proposed Remedy
Delphi Corporation
480 North Dixie Drive
Vandalia, Ohio

Dear Mr. Boland:

Enclosed is the Statement of Basis (Proposed Remedy) for the Delphi Corporation facility located in Vandalia, Ohio. The United States Environmental Protection Agency (U.S. EPA) is announcing the availability of the Proposed Remedy for public review and comment.

The Administrative Record supporting the Proposed Remedy is available for review at the Vandalia Branch Library located at 500 S. Dixie Drive in Vandalia, Ohio and the U.S. EPA, Region 5 RCRA Records Center (7th Floor) located at 77 West Jackson Boulevard in Chicago, Illinois.

U.S. EPA expects to open a public comment period on the Proposed Remedy from November 7 to December 15, 2006. A public meeting is scheduled for November 16, 2006 at the Vandalia Senior Center, 21 Tionda Drive South in Vandalia, Ohio. The public comment period and meeting will be announced in the Dayton Daily News and Vandalia Drummer newspapers. Written comments on the Proposed Remedy can be sent to:

Mr. Kenneth Bardo
EPA Project Manager
U.S. EPA, Region 5
77 W. Jackson Blvd.
Corrective Action Section, DE-9J
Chicago, Illinois 60604-3590

Comments may also be sent via e-mail to bardo.kenneth@epa.gov.

The U.S. EPA will consider all substantive comments received during the public comment period prior to making its Final Decision on the remedy. Each person who provides comments or requests notice of the decision will receive the Final Decision.

If you have any questions, please contact me at (312) 886-7566 or at bardo.kenneth@epa.gov.

Sincerely yours,



Kenneth S. Bardo
EPA Project Manager
Corrective Action Section

Enclosure

STATEMENT OF BASIS

for

**Delphi Corporation
Vandalia, Ohio**

EPA I.D. Nos. OHD 052 151 701 and OHD 000 048 454



October 2006

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List of Acronyms

AO	- Administrative Order
AOC	- Administrative Order on Consent
AOI	- Area of Interest
CMP	- Corrective Measure Proposal
DCE	- cis-1,2-dichloroethene
DNAPL	- Dense non-aqueous phase liquid
GM	- General Motors Corporation
HVAC	- Heating, ventilation, and air conditioning
MCL	- Maximum Contaminant Level
O&M	- Operation and maintenance
PCE	- Tetrachloroethene
ppb	- Part per billion
RCRA	- Resource Conservation and Recovery Act
RFI	- RCRA Facility Investigation
SB	- Statement of Basis
TCA	- 1,1,1-trichloroethane
TCE	- Trichloroethene
U.S. EPA	- United States Environmental Protection Agency

***Statement of Basis for Delphi
Corporation Located in
Vandalia, Ohio***

INTRODUCTION

This Statement of Basis (SB) presents and explains the proposed remedy to address contaminated groundwater, soil, and indoor air at and from the Delphi Corporation (Delphi) facility located in Vandalia, Ohio. It includes summaries of all potential remedy alternatives evaluated by Delphi. The United States Environmental Protection Agency (U.S. EPA) will select a final remedy after the public comment period has ended and substantive comments provided by the public have been considered.

This SB is being issued by U.S. EPA as part of its public participation responsibilities under the Resource Conservation and Recovery Act (RCRA). The document summarizes information that can be found in greater detail in the final RCRA Facility Investigation (RFI), Corrective Measure Proposal (CMP), and other pertinent documents contained in the Administrative Record. An index to the Administrative Record is attached. U.S. EPA encourages the public to review these documents in order to gain a more comprehensive understanding of the RCRA corrective action activities conducted at the Delphi facility.

U.S. EPA may modify the proposed remedy or select another remedy based on new information or public comments. Therefore, the public is encouraged to review and comment on the SB. All documents supporting this SB are contained in the Administrative Record located at the Vandalia Branch Library, 500 S. Dixie Drive, Vandalia, Ohio and U.S. EPA, Region 5 Record Center (7th Floor), 77 W. Jackson Blvd., Chicago, Illinois.

PROPOSED REMEDY

U.S. EPA proposes the following remedy to address all contaminated groundwater, soil, and indoor air at and from the Delphi facility:

- Continued operation of the Delphi bedrock groundwater migration control system that intercepts and captures contaminants (chlorinated solvents) in the Sugar Rock aquifer on-site and prevents their migration off-site. Captured contaminants are

treated on-site using an air stripper and treated groundwater is discharged by permit to East Creek;

- Continued operation of the Delphi overburden groundwater migration control system that captures contaminants (chlorinated solvents) from the water table at on-site source areas. Captured contaminants are conveyed to the bedrock groundwater migration control treatment system for on-site treatment;
- Initiation of a groundwater migration control program in a sandy layer in the north-central portion of the facility along Northwoods Boulevard. A recovery well will be installed to eliminate the potential migration of contaminants (chlorinated solvents) into North Creek;
- Continued operation of the heating, ventilation, and air conditioning (HVAC) system in on-site buildings as necessary to protect workers from unacceptable risks posed by the migration of soil vapor contaminated with chlorinated solvents to indoor air;
- Implementation of a long-term groundwater, surface water, and indoor air monitoring program to ensure the integrity of the proposed remedy and protect human health and the environment;
- Conduct periodic technical reviews that evaluate current site conditions using available monitoring data. Assess whether alternative technologies are necessary and available to expedite groundwater cleanup in the off-site Sugar Rock aquifer;
- Consider municipal and township ordinances to restrict future groundwater use. Provide periodic public advisories that notify the public of local groundwater restriction ordinances; and
- Initiate environmental covenants to restrict on-site groundwater use, limit site use to industrial/commercial activities, and impose controls on excavation procedures for construction workers and future redevelopment workers.

A more detailed discussion of U.S. EPA's proposed remedy is provided below.

FACILITY BACKGROUND

The Delphi facility is located at 480 North Dixie Drive Highway and 250 Northwoods Boulevard in Vandalia, Ohio. It is bound on the west by the Dayton International Airport and on the east by Interstate I-75. The Great Miami River is located approximately one mile to the east (Figure 1).

Land use surrounding the Delphi facility is mixed industrial, commercial, and residential. Large residential neighborhoods are located to the south and southeast of the Delphi facility. The large residential neighborhoods are on public water provided by the City of Vandalia. Vandalia currently purchases its public water supply from the City of Dayton. However, Vandalia and Tipp City established the Northern Area Water Authority and expect to have a new public water facility online and operational in 2007. Neither the existing water supply source nor the new proposed facility are expected to be affected by site-based contamination. However, residences and small businesses north and east of the Delphi facility along Engle Road, Old Springfield Road, and at some locations along Cassel Road, use private wells as a water source.

The Delphi facility began operations in 1941 as the Aeroproducts Division of General Motors Corporation (GM). Airplane and helicopter blades and parts were manufactured and tested until 1958. The facility was idle from 1958 until 1961 when the Inland Manufacturing Division of GM began manufacturing auto parts. Delphi Corporation was spun-off from GM in May 1999 and has owned and operated the facility since then. Delphi fabricates and assembles rubber, plastic, and metal automotive components.

On September 23, 1998, U.S. EPA issued a RCRA Administrative Order (AO) for Corrective Action to GM. The AO required GM to conduct necessary investigations to fully identify the nature and extent of contamination at the facility, to evaluate the corrective measures necessary to protect human health and the environment, and to implement the necessary corrective measures. That AO never became effective because GM instituted proceedings challenging its issuance. These proceedings ended when U.S. EPA and Delphi entered into an Administrative Order on Consent (AOC) for Corrective Action on January 17, 2002. The final AOC requires Delphi to complete specific correction action activities within a certain time frame, including stabilizing the migration of contaminated groundwater and controlling exposures that could potentially impact human health.

During the three-year period between issuance of the AO and entering of the AOC, Delphi performed the following voluntary work to expedite investigations and correct environmental problems at its facility:

- Obtained necessary permits from the State of Ohio and installed a groundwater remediation system and vacuum enhanced groundwater/DNAPL recovery and treatment system. The purpose of these systems was to capture and remove groundwater contaminants before they migrated off-site.
- Implemented a water use survey and sampling plan. The purpose of this plan was to locate and sample private wells and collect information regarding well construction. As a result of the survey, Delphi worked with homeowners along Cassel Road to abandon 15 private wells and connect six residences to the Vandalia public water supply. Deed restrictions for these properties were filed to prohibit the future drilling of any wells.
- Installed numerous bedrock monitoring wells off-site to determine the extent of groundwater contamination in the regional Sugar Rock aquifer.
- Submitted a report detailing the current conditions at and near the facility that formed the basis for the RFI.

RCRA Facility Investigation (RFI) Results

The purpose of the RFI is to fully characterize the nature and extent of contamination at the Delphi facility. The RFI concluded that:

- There is an extensive area of contaminated groundwater in the deep Sugar Rock aquifer underlying the Delphi facility. The contaminant plume extends off-site, east of Cassel Road, where it discharges as springs along the west valley wall of the Great Miami River (see Figure 2). The main contaminant is trichloroethene (TCE) along with its degradation products, cis-1,2-dichloroethene (DCE) and vinyl chloride. These contaminants found in groundwater have concentrations that could adversely impact human health for residents using well water. The contaminant concentrations exceed Federal Maximum Contaminant Levels (MCLs) used to protect human health.
- There are less extensive areas of groundwater contamination in the near-surface overburden (interbedded layers of clay and sand) and deeper Top-of-Rock aquifer. Contamination of the overburden is confined on-site while contamination in the Top-of-Rock extends slightly off-site to the northeast in the vicinity of Engle Road. The main contaminants are TCE, DCE, 1,1,1-trichloroethane (TCA), and methylene chloride. Residual waste in the form of dense non-aqueous phase liquid (DNAPL) is present on-site in the overburden.

- The source of contaminated groundwater in the overburden, Top-of-Rock, and Sugar Rock appears to be from leaking underground storage tanks at the Delphi facility that were removed in 1989 and 1993. DNAPL containing TCE was apparently able to penetrate an old test well or abandoned water production well on-site and infiltrate into the deeper Top-of-Rock and Sugar Rock aquifers.
- Certain areas on-site have contaminant concentrations in soil that may pose an unacceptable risk to workers in the west manufacturing building from soil vapor migration to indoor air. They are Areas of Interest (AOI) 15/50 (TCE and DCE), AOI 43 (naphthalene and 2-methylnaphthalene), and AOI 45 (vinyl chloride).
- Certain areas on-site have contaminant concentrations in soil (AOI 43) and groundwater (area just north of manufacturing buildings in the vicinity of the Northwoods Boulevard plant entrance) that may pose an unacceptable risk to construction workers and future redevelopment workers.

SUMMARY OF FACILITY RISKS

Groundwater

Off-site consumption of contaminated groundwater in the Sugar Rock aquifer may pose an unacceptable risk because concentrations of TCE, DCE, and vinyl chloride exceed their respective MCLs. Groundwater is a source of potable water north and east of the Delphi facility along Engle Road, Old Springfield Road, and at a few residences along Cassel Road.

The potential risk from contaminated groundwater warrants a corrective measure to protect human health in the event that groundwater is consumed. The goal of the proposed corrective measure is to cut-off the source of contamination before it migrates off-site, restrict groundwater use, and monitor the contaminant plume and private wells to ensure that human health and the environment is protected.

Groundwater cleanup objectives include three components: groundwater cleanup levels, point of compliance, and remediation time-frames. Groundwater cleanup levels represent specific concentrations of chemicals designed to be protective of the groundwater use and other possible routes of exposure. Point of compliance represents the locations where the media cleanup levels should be achieved. Remediation time-frames typically include both the time it would take to implement the remedy and the estimated time to achieve the groundwater cleanup levels at the point of compliance.

The groundwater cleanup levels at the Delphi facility are derived from MCLs developed under the Safe Drinking Water Act. These are risk-based goals such that attaining the given concentration will not result in adverse health effects or an excess cancer rate.

The point of compliance for groundwater represents where groundwater cleanup levels should be achieved within a contaminated aquifer. The groundwater point of compliance at the Delphi facility is throughout the area where groundwater is contaminated above the cleanup levels. U.S. EPA typically refers to this point of compliance as the “throughout-the-plume” point of compliance.

The long-term groundwater cleanup levels for contaminants identified in the table below are exceeded throughout-the-plume in the following locations:

- Benzene, DCE, ethylbenzene, methylene chloride, PCE, TCE, vinyl chloride, and xylenes in the shallow water table beneath and adjacent to the on-site manufacturing buildings.

- Benzene, 1,1-dichloroethene, DCE, ethylbenzene, methylene chloride, TCA, TCE, vinyl chloride, and xylenes in the First Sand zone (overburden) beneath and adjacent to the on-site manufacturing buildings.
- DCE, trans-1,2-dichloroethene, TCE, and vinyl chloride in the Second Sand zone (overburden) beneath and adjacent to the on-site manufacturing buildings.
- DCE, methylene chloride, TCA, and TCE in the Top-of-Rock aquifer just north of the on-site manufacturing buildings.
- DCE, methylene chloride, TCA, and TCE in the regional Sugar Rock aquifer beneath the northeast portion of the facility and extending eastward and southeastward over one-mile where the aquifer discharges as springs from bedrock outcrops along the western valley wall of the Great Miami River.

GROUNDWATER CONTAMINANT	GROUNDWATER CLEANUP LEVEL (ppb ^a)
benzene	5
1,1-dichloroethene	7
cis-1,2-dichloroethene (DCE)	70
trans-1,2-dichloroethene	100
ethylbenzene	700
methylene chloride	5
tetrachloroethene (PCE)	5
1,1,1-trichloroethane (TCA)	200
trichloroethene (TCE)	5
v vinyl chloride	2
x xylenes	10,000

^a ppb - parts per billion or micrograms per liter

Soil/Indoor Air

Concentrations of contaminants found in soil in localized areas at the Delphi facility may pose an unacceptable risk to workers from soil vapor migration to indoor air within the west manufacturing building. The contaminants of concern are TCE, DCE, vinyl chloride, 2-methylnaphthalene, and naphthalene. The west manufacturing building is not currently used. If it is used, the HVAC system would provide adequate ventilation to minimize the potential risk from soil vapor migration to indoor air. Indoor air monitoring would be used to confirm safe working conditions.

Concentrations of TCE and DCE in soil at AOI 15/50 also present a potential concern for migration to groundwater. However, there are already significant concentrations of residual TCE and DCE in shallow groundwater that are being contained on-site and remediated by the overburden groundwater migration control system.

SCOPE OF CORRECTIVE ACTION

Corrective measures are necessary to address contamination present in groundwater and soil/indoor air at and in the vicinity of the Delphi facility.

Contaminated groundwater is the principal threat because of the long-term potential for public use. The short-term cleanup objectives are to control contaminant sources and monitor the migration of contaminated groundwater. The long-term cleanup objective is to reduce the contaminant concentrations throughout-the-plume below groundwater cleanup levels (MCLs) in a reasonable time (approximately 20 years).

Localized areas of contaminated soil are a risk due to the long-term potential for impacts on indoor air and migration of contaminants to groundwater. The cleanup objectives are to minimize their contributions to indoor air and capture the contaminants when they migrate to groundwater.

SUMMARY OF POTENTIAL REMEDY ALTERNATIVES

The potential remedy alternatives evaluated by Delphi to address groundwater and soil/indoor air contamination are presented below. These alternatives are discussed in detail in the CMP (Revision 1, dated June 5, 2006).

Groundwater

- **Institutional Controls:** The Delphi property deed will be modified to include a restriction on groundwater use. A local ordinance restricting future groundwater use will be pursued with the City of Vandalia and Butler Township. Deeds for properties within the impacted area along Cassel Road have already been modified to restrict groundwater use. Periodic public advisories would be distributed to remind residences of local ordinances that restrict groundwater use.
- **Migration Control (Bedrock and Overburden Groundwater):** The extraction well for the bedrock groundwater migration control system and the modified storm sewer/recovery well for the overburden groundwater migration control system will continue to be used to capture contaminated groundwater before it migrates off-site. The extracted contaminated groundwater from both systems is combined and treated on-site using an air stripper. Treated groundwater is released through a permitted discharge.
- **Pump-and-Treat (Bedrock Groundwater):** Recovery wells would be installed in bedrock to extract contaminated groundwater from the off-site plume. Extracted groundwater would be treated through filtration and carbon adsorption. A permit would be obtained to discharge the treated groundwater.
- **Enhanced Anaerobic Bioremediation (Bedrock Groundwater):** Injection wells would be installed in the bedrock to treat contaminated groundwater in the off-site plume. The chemicals injected would increase microorganism activity capable of breaking down and eliminating the contaminants.
- **Monitoring:** Selected wells and surface water will be monitored to assess whether the contaminant plume remains stable (i.e., not increasing in size) and ensure that contamination is not present in private wells that poses an unacceptable risk to human health. Trends for contaminant concentrations in the Sugar Rock aquifer will be analyzed to evaluate whether the proposed remedy is effective.

Soil/Indoor Air

- **Institutional Controls:** The Delphi property deed will be modified to limit future land use to industrial/commercial and impose controls on subsurface excavations.
- **Excavation and Treatment/Disposal:** Contaminated soil at AOIs 15/50, 43, and 45 would be excavated and sent off-site for treatment/disposal. The excavated areas would be backfilled with clean soil and the concrete floor replaced.
- **Soil Vapor Extraction:** A vacuum would be applied to induce flow of gas-phase contaminants from soil to extraction wells. Captured contaminants would be treated as necessary and vented to the air.
- **Sub-slab Depressurization:** A slight vacuum would be applied to induce a negative pressure at or immediately below the building foundation to prevent vapor migration into the building,
- **Operate HVAC:** Building ventilation will be used to exchange indoor air and minimize the buildup of contaminated soil vapor in indoor air.
- **Monitoring:** Annual monitoring of indoor air to ensure that contaminants infiltrating the building from underlying contaminated soil do not pose an unacceptable risk to human health.

Delphi estimates the capital cost, annual operation and maintenance (O&M) cost, and total estimated cost for each potential remedy alternative to be:

Potential Remedy Alternative	Estimated Capital Cost	Annual O&M Cost	Total Estimated Cost *
Bedrock Groundwater Migration Control	\$ 0 ^b	\$ 180,000	\$ 2,960,000
Bedrock Groundwater Pump and Treat	\$ 3,361,000	\$ 1,620,000	\$ 30,003,000
Bedrock Groundwater Enhanced Anaerobic Bioremediation	\$ 30,266,000	\$ 150,000	\$ 30,974,000
Groundwater Use Restriction	\$ 24,000	\$ 2,000	\$ 57,000
Overburden Groundwater Migration Control	\$ 310,000 ^c	\$ 120,000	\$ 2,284,000
Excavation (AOIs 15/50, 43, and 45)	\$ 2,329,000	\$ 0	\$ 2,329,000
Soil Vapor Extraction (AOI 15/50)	\$ 157,000	\$ 31,237	\$ 671,000
Sub-Slab Depressurization (AOIs 43 and 45)	\$ 55,000	\$ 17,998	\$ 350,000
HVAC Operation (Site)	\$ 0 ^b	\$ 5,225	\$ 88,000

* O&M costs included in total estimated cost are for 20 years (5 years for enhanced anaerobic bioremediation).

^b Fully constructed.

^c Partially constructed.

EVALUATION OF PROPOSED REMEDY

U.S. EPA's proposed remedy to address contaminated groundwater and soil, and control indoor air at and from the Delphi facility is:

- *Groundwater* - Continued removal of contaminants in source areas (groundwater and DNAPL), control off-site contaminant migration, and monitoring. Periodic technical reviews will be conducted and possible contingent remedies implemented if site conditions change or groundwater cleanup levels are not met in a reasonable time-frame (approximately 20 years).
- *Soil* - Contaminated subsurface soil will be remediated indirectly by the overburden groundwater migration control system. The system captures dissolved contaminants in soil below the water table within the on-site source areas;
- *Indoor Air* - Operation of HVAC systems in on-site buildings and monitoring of indoor air to protect on-site workers.
- *Institutional Controls and Monitoring* - Deed restrictions on land and groundwater use, restrictions for on-site excavations to protect construction workers and future redevelopment workers, and a groundwater, surface water, and indoor air monitoring program to assess the effectiveness of the remedy.

The proposed remedy is represented by the shade boxes in the table on page 11. The total estimated cost of the proposed remedy is \$5,389,000. Delphi is required to provide financial assurance to ensure that the proposed remedy can be implemented over its lifetime (minimum of 20 years).

The following discussion profiles the performance of the proposed remedy against technical standards and other factors for evaluating a remedy.

1. **Protect Human Health and the Environment.** The overall protection of human health is addressed effectively for groundwater by source removal, migration controls, monitoring, and institutional controls. Source removal of DNAPL and high contaminant concentrations in the water table expedite groundwater cleanup; on-site migration controls eliminate additional off-site migration of contaminants; monitoring protects water well users in the area; and institutional controls restrict groundwater usage throughout the contaminant plume. Monitoring wells within and at the perimeter of the groundwater contaminant plume will be used to demonstrate that the plume is not expanding and that the on-site overburden and

bedrock groundwater migration control systems are effective. In the alternative, a more active engineered remedy will be used to clean up groundwater if the proposed remedy does not result in the timely cleanup of groundwater.

Institutional controls to restrict land use are effective methods to protect human health when combined with the proposed engineered controls. Long-term maintenance of the HVAC system and on-site excavation controls will protect human health by minimizing exposure to contaminants.

2. **Attain Media Cleanup Standards.** The original source of contamination has been addressed by removal of the leaking underground storage tanks and associated contaminated soil; the recovery of DNAPL by the vacuum-enhanced groundwater/DNAPL recovery and treatment system; and the collection of highly contaminated shallow groundwater and DNAPL by the overburden groundwater migration control system. DNAPL has been significantly reduced (approximately 1200 pounds were recovered) and is no longer recoverable by the vacuum-enhanced groundwater/DNAPL recovery and treatment system. The overburden groundwater migration control system continues to operate to collect and treat contaminated groundwater. Approximately one-half to one pound of contaminant mass is removed daily (total mass removed is over 550 pounds). Removal of the sources, DNAPL and contaminant mass is a quick and effective corrective measure to expedite cleanup of soil and groundwater.

The bedrock groundwater migration control system in place eliminates any further migration of contaminants off-site and is expediting cleanup of the Sugar Rock aquifer off-site. Approximately one pound of contaminant mass is removed daily (total mass removed is over 2250 pounds). A statistical analysis of Sugar Rock groundwater downgradient of the bedrock groundwater migration control system shows that there is a significant decrease in contaminant concentrations. These trends show that the bedrock groundwater migration control system is effective and meeting its design goals. Trends will continue to be monitored to assess the ongoing effectiveness of the bedrock groundwater migration control system. Groundwater monitoring will be performed for a minimum of 20 years to assess the attainment of groundwater cleanup goals (MCLs).

3. **Control the Sources of Releases.** The removal of residual DNAPL and contaminated groundwater on-site provides an effective source control program to ensure the long-term effectiveness and protectiveness of the remedy.

4. **Comply with Any Applicable Standards for Management of Wastes.** Waste generated during implementation of the remedy (i.e., contaminated groundwater and DNAPL) is properly characterized and treated/disposed in accordance with all applicable regulations and permits.
5. **Long-term Reliability and Effectiveness.** Reliability of the proposed remedy is evaluated through O&M requirements and demonstrated effectiveness of the groundwater migration control systems in place. Both the overburden and bedrock groundwater migration control systems have been operational for three to five years. Very little maintenance is required and they have been shown to be effective in capturing and removing contaminant mass. The groundwater remedy will be monitored to ensure reliability. In the alternative, a more active engineered remedy will be used to clean up groundwater if groundwater cleanup levels are not achieved within a reasonable time-frame (approximately 20 years).
6. **Reduction in the Toxicity, Mobility, or Volume of Wastes.** Removal of contaminant mass from on-site groundwater will prevent further off-site migration of contaminants. Monitoring will assess the reduction in toxicity of contaminants in groundwater.
7. **Short-term Effectiveness.** An O&M manual has been developed to ensure safety of the remedy through proper maintenance. Corrective measure activities associated with contaminated groundwater have a developed health and safety plan.
8. **Implementability.** Necessary State permits have already been obtained for the groundwater remedy. The groundwater remedy has already been implemented and has operated for five years. A local groundwater use ordinance is being pursued with the City of Vandalia and Butler Township. Institutional controls in the form of groundwater use restrictions will be implemented in accordance with the U.S. EPA-approved Corrective Measures Implementation Work Plan.
9. **Cost.** The total estimated cost of the various remedial alternatives to address contaminated groundwater and indoor air varies from 5.4 to 35.6 million dollars. The total estimated cost of the proposed remedy is 5.4 million dollars. This cost does not include a possible alternative remedy for groundwater if cleanup levels are not achieved within a reasonable time-frame. This less costly remedial alternative is expected to be as protective of human health and the environment as the more costly alternatives.

Based on information currently available, the proposed remedy provides the best balance with respect to the standards described above. U.S. EPA believes that the proposed remedy is protective of human health and the environment, and will effectively control exposure to contaminants in groundwater, soil, and indoor air. In the alternative, a contingent remedy will be used if the bedrock and overburden groundwater migration control systems do not achieve required groundwater cleanup levels in a reasonable time. All applicable standards regarding groundwater protection and on-site/off-site waste management will be addressed and complied with during the corrective measures implementation process.

PUBLIC PARTICIPATION

U.S. EPA seeks input from the local community on the proposed remedy to address contaminated groundwater, soil, and indoor air at and from the Delphi facility. U.S. EPA will initiate a 45-day public comment period for participation of the local community in the final remedy selection.

The Administrative Record for the Delphi facility is available at the following locations:

Vandalia Branch Library
500 S. Dixie Drive
Vandalia, Ohio 45377
(937) 898-6541

U.S. EPA, Region 5
RCRA Records Center
77 West Jackson Boulevard, 7th Floor
Chicago, Illinois 60604-3590
(312) 886-0902
Hours: Mon-Fri, 8:00 a.m. - 4:00 p.m.

After consideration of the comments received, U.S. EPA will select the final remedy and document its selection in the Final Decision and Response to Comments. In addition, public comments will be summarized and responses provided. The Final Decision and Response to Comments will be drafted at the conclusion of the public comment period and incorporated into the Administrative Record.

To send written comments or request technical information on the Delphi facility, please contact:

Mr. Kenneth Bardo
EPA Project Coordinator
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Corrective Action Section, DE-9J
Chicago, Illinois 60604-3590
(312) 886-7566
E-mail: bardo.kenneth@epa.gov

To request information on the public meeting for the proposed remedy at the Delphi facility, please contact:

Ms. Terri Rancher
Community Relations Coordinator
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Information Management Section, DM-7J
Chicago, Illinois 60604-3590
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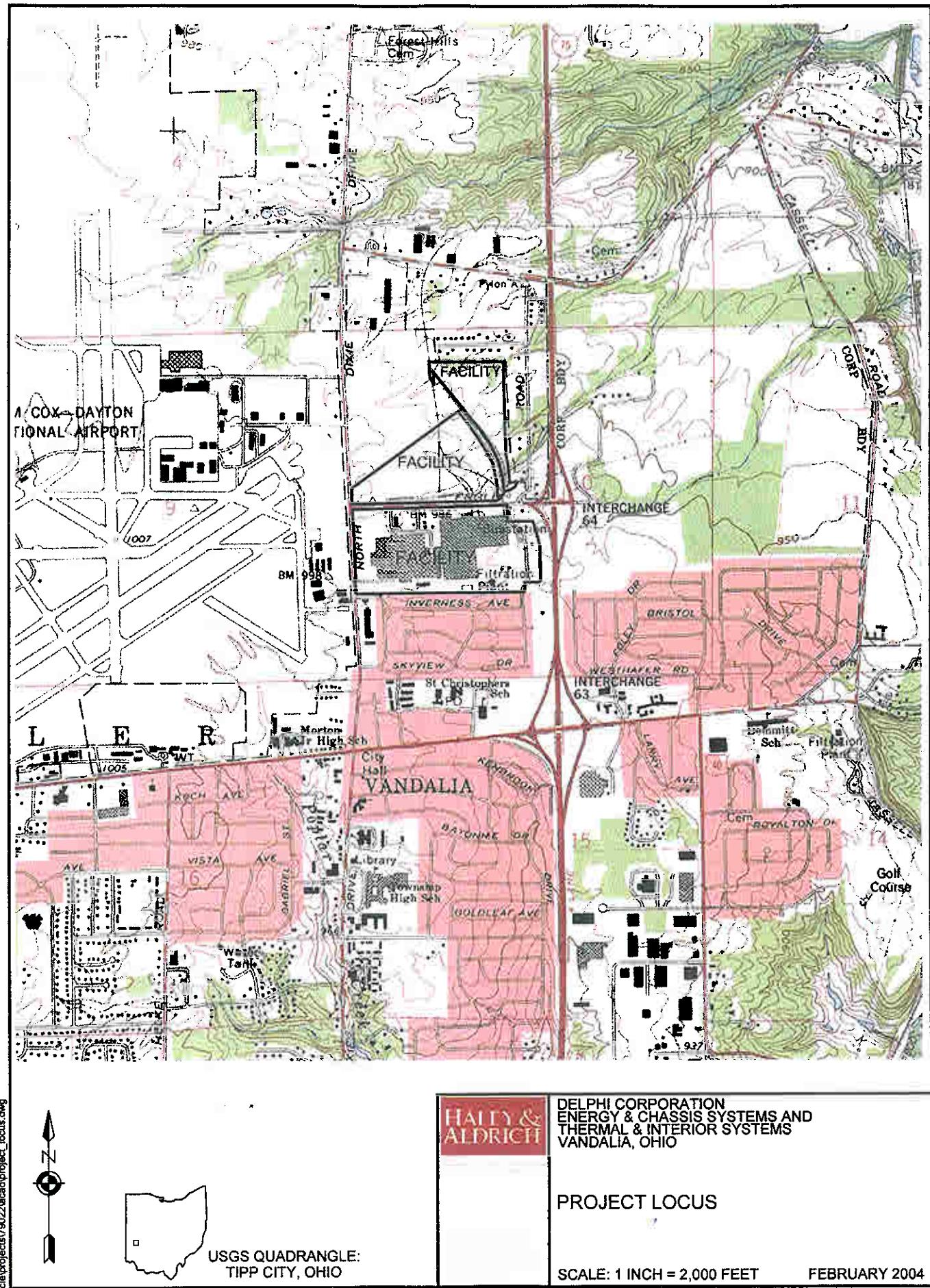


FIGURE 1

